



# Guzek Associates, Inc.

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May 11, 2015

RECEIVED  
EPA REGION III

MAY 13 2015

NPDES PERMITS BRANCH  
(3WP41)

U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2029

Attention: Mr. John Lovell

Reference: SAPA Extruder, Inc., Mountaintop, PA Operations  
Industrial User Requirements  
PAP 245985  
Notification of Changed Discharge

Dear Mr. Lovell:

In behalf of my above-referenced Client, I wish to submit this update on SAPA's recent changes to their sources of wastewater, which is treated and then discharged to Mountaintop Area Joint Sewer Authority (MAJSA), our local POTW.

On November 6 2014, Fabrication's WWTS-2 was decommissioned. Simultaneously, Fabrication's wastewater sources were re-piped to Anodizing's Pit and its WWTS-1, which is now the only remaining pretreatment facility at SAPA that discharges effluent to the local POTW. We request you revise the above-referenced EPA Discharge Agreement to consolidate WWTS-2 into WWTS-1. Current process mapping is enclosed.

Recently, I worked with Mike Bogdon, Quality Control Engineer at SAPA, to audit the existing wastewater sources throughout the SAPA facility. Based on that audit, I am enclosing Mr. Bogdon's current process flow diagrams, and a copy of your 12/12/2013 EPA letter on effluent limits with my blue-line markups suggesting updated corrections to the number of baths, rinses, and scrubbers that currently exist at SAPA.

For quite some time now, SAPA and its predecessors had erroneously advised EPA of their average daily production rate through the Anodizing Department. They did not know their mass-based discharge limits are to be based on the average daily production rate of Extruded Products. My attached analysis of the monthly extruded production values for the last 5-years finds their "Representative Production Value" is actually 105,518 lbs extruded/day; not the 38,441 lbs/day used in the April 11, 2013 EPA letter for establishing their limits.

Because the above-mentioned changes are significant, we request you consider revising the effluent loading limits for SAPA's pretreatment facility known as WWTP-1. Please call me with any technical questions you might have.

Very truly yours,

Joseph J. Guzek, P.E.

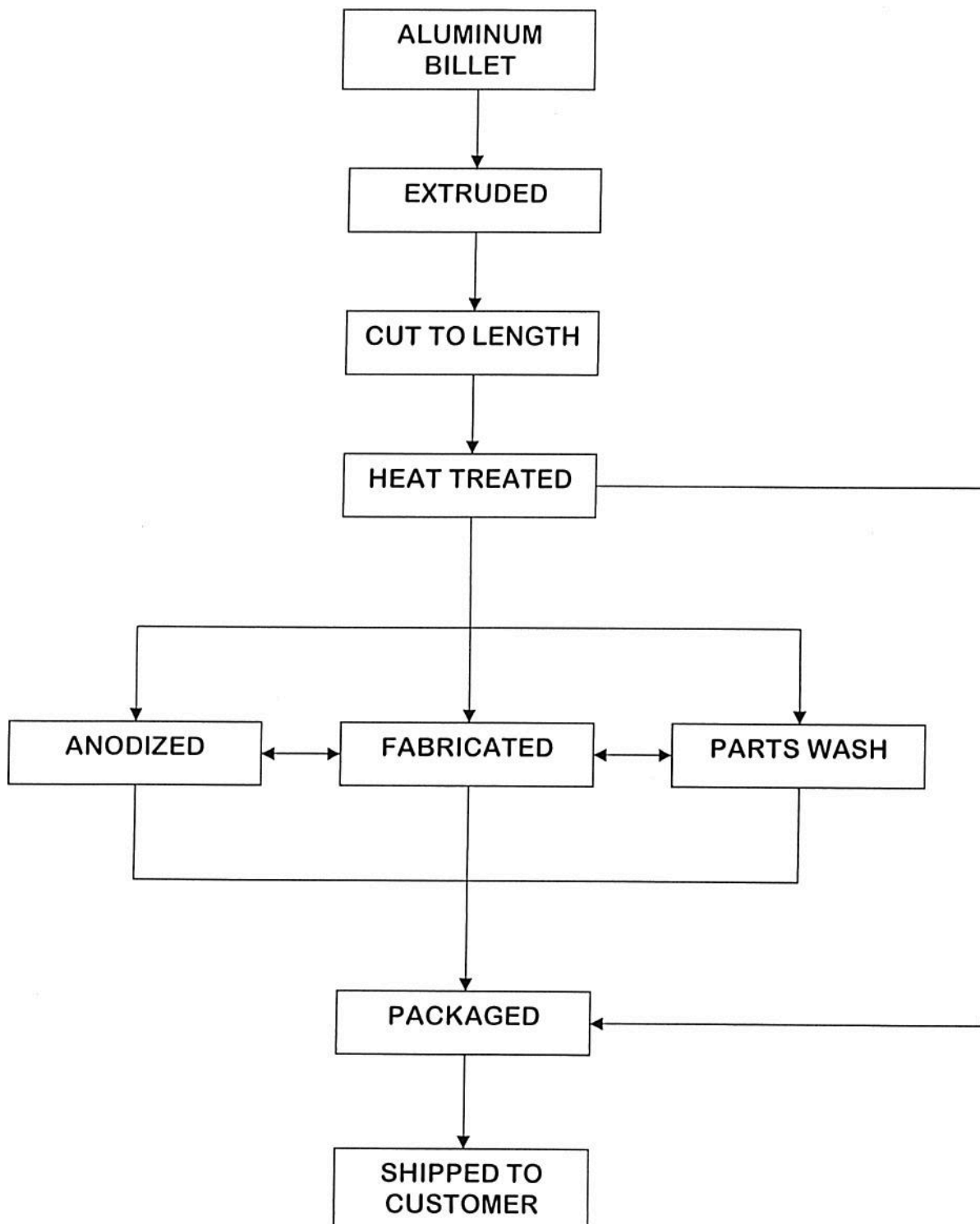
Enclosures

CERTIFIED RETURN RECEIPT MAIL #7014 2120 0004 7286 7742

E-cc: Tom Mayka - MAJSA  
Linda Campbell - SAPA  
Mike Bogdon - SAPA

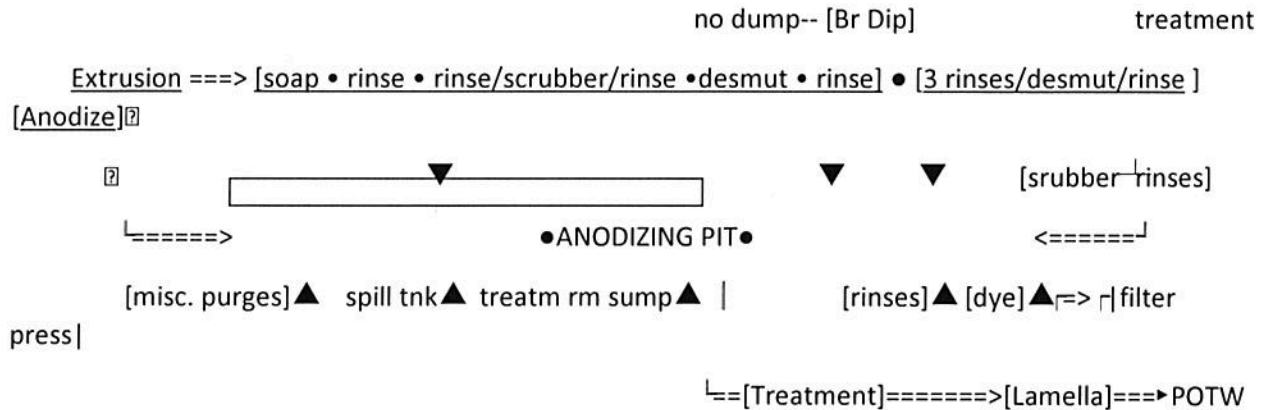
A

**Figure 1. SAPA PROCESS FLOW DIAGRAM**

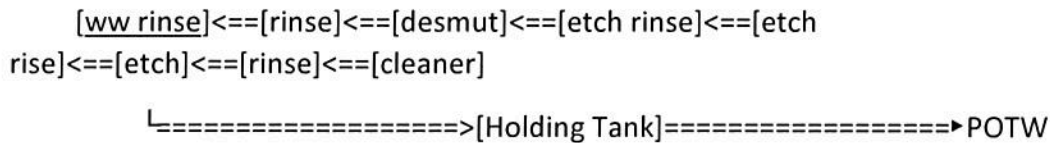


B

In response to the recent updating of the production numbers for the extrusion and subsequent operations conducted at your facility, copies of the computer generated tabulation of the discharge limits for the regulated pollutants monitored at WWTS-1 are forwarded for your review. The discharge limits are based on the percentage level of production through each process conducted in terms of million off-lbs/day. Below is a simple outline of the processes conducted...



Our February 5, 2014 e-mail refers to a production rate 300 lbs/wk (therefore 300 lbs/day) on which the discharge limits for the regulated pollutants monitored at WWTS-2 are based. This production level is still in place pending any production update forwarded. Below is a simple outline of processes conducted...



Should you have any questions, please contact Robert Hansford at (215) 814-5791 or myself at (215) 814-5790.

Sincerely,

John Lovell (3WP41)





Industrial User Fact Sheet (revised)

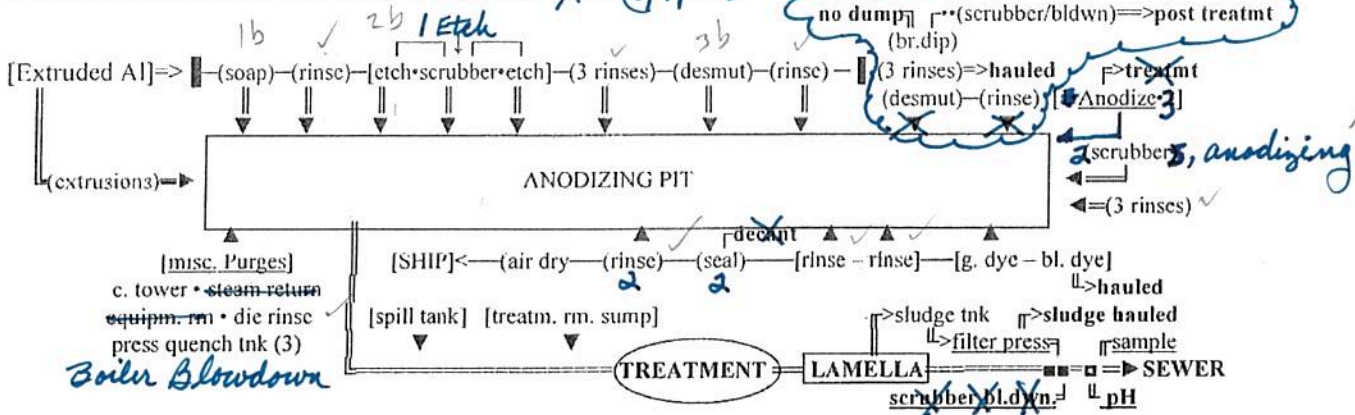
SAPA Extruders, Inc.

330 Elmwood Avenue – Crestwood Industrial Park – Mountain Top Pa 18707

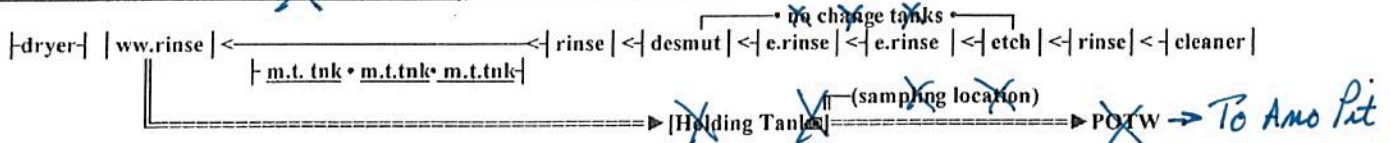
245985

Extrusion/Anodizing Process... WWTS-1 (9/29/11)

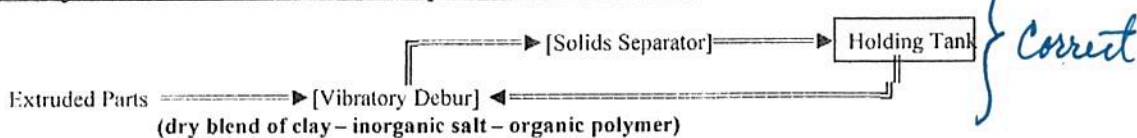
*(5/4/15)*



Wash Process Line... WWTS-2 (9/24/13)... \*chromating discontinued



Vibratory Debur Process... Closed Loop Process (SAPA 5/8/13)



Regulatory Considerations:\*

\$467 Al-Forming, Subpart C – PSNS (major expansion at the facility after 1982 NS date)...

- WWTS-1: Core ~ Cleaning/Etching Bath ~ Cleaning/Etching Rinse ~ Cleaning/Etching Scrubber
- WWTS-2: Parts washing...cleaning/etching, i.e., chemical solution bath with rinses (\$467.02(i))
- Deburring: Closed- loop process with no discharge...(SAPA info 5/14/13) *correct*

\*see attached Discharge Limitations Determination Table based on  
ave productn/day thru ea unit operation (lbs/mil off-lbs) x standard (mil off-lbs/day)

Monitoring Parameters: (Cr ~ CN ~ Zn) ~ (TTO/O&G) ~ (pH ~ Production ~ Total Flow ~ Regulated Flow)

•Frequency: <-----1/3 months-----> <-----1/month----->

Pretreatment Coordinator Concurrence *JH 12/5/13* 12/13

*Blue line notes  
by Joe Dwyer  
570-586-9700*



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Customer Service Hotline: 1-800-438-2474